

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
RENEWAL

PERMITTEE

Export Packaging Company  
Attn: Dave Coopman  
525 East 10th Avenue  
Milan, Illinois 61264

Application No.: 95120196

I.D. No.: 143005AAZ

Applicant's Designation:

Date Received: December 21, 2001

Subject: Painting and Packaging Plant

Date Issued: November 19, 2003

Expiration Date: November 19, 2008

Location: 6403 West Smithville Road, Bartonville

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 2 automated back to back paint booths with dust collection, manual paint booth with dust collection, and safe coat coating process pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic materials (VOM) to less than 100 tons/year, total hazardous air pollutants to less than 25 tons/year and single hazardous air pollutant to less than 10 tons/year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

2. Emissions and operation of painting and coating operations shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Lb/Year)</u>	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
Paints	4,560	45,600	4,560	22.80
Clean-Up Solvents	500	5,000	250	1.25

These limits are based on complete volatilization of the VOM and HAP contents of the materials, 50% recovery of solvent, and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. This permit is issued based on negligible emissions of volatile organic material (VOM) from the safe coat coating process. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
5. This permit is issued based on negligible emissions of particulate matter (PM) from the 3 paint booths. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
6. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
7. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
8. The Permittee shall maintain records of the vendor recommendations at the facility and be available for inspection and copying by the Illinois EPA.
9. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
10. The Permittee shall maintain the following records:
  - a. Name, usage (gallons/month and gallons/year), VOM and HAP content (lb/gallon or % weight), and VOM and HAP emissions (lb/month and tons/year) for the following materials:

- i. Paints;
  - ii. Coatings; and
  - iii. Clean-up solvents.
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
  
and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614
14. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. Usage records for Condition 10(a).

It should be noted that the parts washers, drying ovens, and wood cutting saws are exempt from state permitting pursuant to 35 Ill. Adm. Code 201.146(o), (ff), (aa), and (jj), respectively

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If you have any questions on this, please call Eric Jones at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:EEJ:psj

cc: Illinois EPA, FOS Region 2  
Illinois EPA, Compliance Section  
Lotus Notes

### Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from a painting and packaging plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 100 tons from VOM, 25 tons/year from aggregate HAPs, and 10 tons from an individual HAP (xylene) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less paint is used in the painting operations, and control measures are more effective than required in this permit.

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